

1 RICHARD NASSAR  
2 11090 SEVEN PINES DR  
3 ALTA LOMA CA 91737  
4 Tel No. 626.221.8307  
5 Email address: rnassarins@gmail.com  
6 Fax: 909.963.5100

7 PLAINTIFF, IN PRO PER

FILED  
2019 FEB 27 PM 4:34  
CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
RIVERSIDE

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10  
11  
12 EDCV19-00377

JFW

SHKx

13 RICHARD NASSAR

Case No.:

14 Plaintiff,

COMPLAINT

15  
16 v.

(Unlawful Debt Collection Practices)

17 BANK OF AMERICA, N.A.

18 Defendant.  
19

20  
21  
22 RICHARD NASSAR ("Plaintiff") alleges the following against BANK OF  
23 AMERICA ("Defendant"):

24  
25 INTRODUCTION

- 26  
27 1. Count I of Plaintiff's Complaint is based on the Rosenthal Fair Debt  
28 Collection Practices Act ("Rosenthal"), Cal. Civ. Code §1788 et seq.

FEE PAID

- 1 2. County II of the Plaintiff's Complaint is based on Telephone Consumer  
2 Protection Act ("TCPA"), 28 U.S.C. §227 et seq.

3  
4 **VENUE**

- 5 3. Jurisdiction of this court over Count II of Plaintiff's Complaint arises  
6 pursuant to 15 U.S.C. §1331 and 28 U.S.C. §1367 grants this court  
7 supplemental jurisdiction over the state claims contained in Count I.  
8 4. Defendant conducts business in the State of California thereby establishing  
9 personal jurisdiction.  
10 5. Venue is proper pursuant to 28 U.S.C. §1391(b)(2).

11  
12 **PARTIES**

- 13 6. Plaintiff is a natural person residing in Alta Loma, California.  
14 7. Plaintiff is the spouse of a consumer or debtor that allegedly owes a debt as  
15 that term is defined by Cal. Civ. Code §1788.2(d)-(e).  
16 8. Defendant is a business entity with a business office located in Charlotte,  
17 North Carolina and conducting business in California.  
18 9. Defendant is a debt collector as that term is defined by Cal. Civ. Code  
19 §1788.2(c), and sought to recover a consumer debt from Plaintiff's spouse.  
20 10. Defendant acted through its agents, employees, officers, members,  
21 directors, heirs, successors, assigns, principals, trustees, sureties, subrogees,  
22 representatives, and insurers.

23  
24 **FACTUAL ALLEGATIONS**

- 25 11. Plaintiff's spouse acquired a credit card from Defendant which was used for  
26 personal, family, and household purposes.  
27 12. Defendant placed calls to telephone number 626.221.8307, which is  
28 Plaintiff's cellular telephone. See Exhibit "A" which is Plaintiff's call log.

- 1 13. Upon information and belief based on the frequency, number, nature, and
- 2 character of these calls, Defendant placed each of its calls to Plaintiff using
- 3 an automatic telephone dialing system or other equipment that has the
- 4 capacity to store and/or produce telephone numbers.
- 5 14. The purpose of these calls was to collect funds from Plaintiff's spouse for
- 6 purchases arising from the credit card.
- 7 15. On or around August 25, 2016, Plaintiff spoke with one of Defendant's
- 8 employees and instructed Defendant to stop calling his cell phone number.
- 9 16. Defendant continued to call Plaintiff's cell phone. See Exhibit "A" which is
- 10 Plaintiff's call log.
- 11 17. Since June 30, 2016, Defendant has called Plaintiff's cell phone at least one
- 12 hundred and fifty (150) times. See Exhibit "A" which is Plaintiff's call log.
- 13 18. During this time period Defendant called Plaintiff's cell phone as many as
- 14 five (5) times in a single day. See Exhibit "A" which is Plaintiff's call log.
- 15 19. Plaintiff is annoyed and feels harassed by Defendant's calls.
- 16 20. Defendant placed these calls voluntarily.
- 17 21. Defendant placed these calls under its' own free will.
- 18 22. Defendant had knowledge that it was using an automatic telephone dialing
- 19 system to place these calls.
- 20 23. Defendant intended to use an automatic telephone dialing system to place
- 21 these calls.
- 22
- 23

### **COUNT I**

### **DEFENDANT VIOLATED THE ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT**

- 24 24. Defendant violated the Rosenthal based on the following:
- 25
- 26
- 27
- 28

- a. Defendant violated the §1788.11(d) if the Rosenthal by causing Plaintiff's telephone to ring repeatedly or continuously to annoy the person called.
- b. Defendant violated §1788.11(e) of the RFDCPA by communicating, by telephone, with the debtor with such frequency as to be unreasonable and to constitute a harassment to the debtor under the circumstances.
- c. Defendant violated the §1788.17 of the Rosenthal by continuously failing to comply with the statutory regulations contained within the FDCPA, 15 U.S.C. §1692 et seq. to wit: Sections 1692d.

WHEREFORE, Plaintiff, RICHARD NASSAR, respectfully requests judgment be entered against Defendant, BANK OF AMERICA for the following:

25. Statutory damages of \$1000.00 pursuant to the Rosenthal Fair Debt Collection Practices Act, Cal. Civ. Code §1788.30(b), and
26. Costs and reasonable attorneys' fees pursuant to the Rosenthal Fair Debt Collection Practices Act, Cal. Civ. Code §1788.30(c), and
27. Any other relief that this Honorable Court deems appropriate.

## **COUNT II**

### **DEFENDANT VIOLATED THE TELEPHONE CONSUMER PROTECTION ACT**

28. Defendant's actions alleged supra constitute numerous negligent violations of the TCPA, entitling Plaintiff to an award of \$500.00 in statutory damages for each and every violation pursuant to 47 U.S.C. §227(b)(3)(B).
29. Defendant's actions alleged supra constitute numerous and multiple knowing and/or willful violates of the TCPA, entitling Plaintiff to an award

1 of \$1500.00 in statutory damages for each and every violation pursuant to 47  
2 U.S.C. §227(b)(3)(B) and 47 U.S.C. §227(b)(3)(C).

3  
4 WHEREFORE, Plaintiff, RICHARD NASSAR, respectfully requests judgment be  
5 entered against Defendant, BANK OF AMERICA, for the following:

6  
7 30. Statutory damages of \$500.00 for each and every negligent violation of the  
8 TCPA pursuant to 47 U.S.C. §227(b)(3)(B);

9 31. Statutory damages of \$1500.00 for each and every knowing and/or willful  
10 violation of TCPA pursuant to 47 U.S.C. §227(b)(3)(B) and 47 U.S.C.  
11 §227(b)(3)(C);

12 32. All court costs, witness fees and other fees incurred; and

13 33. Any other relief that this Honorable Court deems appropriate.  
14

15 RESPECTFULLY SUBMITTED,  
16

17  
18 Dated: February 13, 2019  
19

20  
21 RICHARD NASSAR  
22 11090 SEVEN PINES DR  
23 ALTA LOMA CA 91737  
24 Tel No. 626.221.8307  
25 Email address: rnassarins@gmail.com  
26 Fax: 909.963.5100  
27 Plaintiff, In Pro Per  
28

# EXHIBIT A

6

6

EXHIBIT A



Welcome to Churchill Credit Solutions! *CCS Consumer Advocacy* wants to thank you for your commitment of embarking on a journey that will ultimately lead to a life that is free of debt. We will be here with you every step of the way.

We know that receiving countless phone calls from creditors and collection agencies can be stressful and agonizing. That is exactly why we are here. Our responsibility is to protect you from harassing creditors and put an end to any and all actions on their part that can be disturbing to you. We work together with our clients to ensure a hassle free time whilst in this debt settlement program.

As a general policy, we encourage all of our clients to avoid engaging in unnecessary conversations with creditors. Conversing with creditors is our job and we will do so with your best interests in mind at all times. If you receive a phone call from them it is very important that you do **not** answer.

However, it is unacceptable if you are receiving numerous phone calls every single day (three or more per day per creditor). If this is the case, we ask you to keep track of these calls and to please continue to not answer. Attached is a page labeled "Call Log". We ask that if you are getting a plethora of phone calls per day, that you write down each call in the log: date, time, creditor and their phone number. This gives us leverage when we contact them and ask them to stop all calls. After two weeks, if these phone calls have not subsided, please mail the attached call log to our office and we will do everything in our power to make them stop as quickly as possible. Our address is as follows:

Churchill Credit Solutions, LLC  
41 Madison Ave, 31<sup>st</sup> Fl  
New York, NY 10010

WE KEPT CALL LOGS

You can also fax us the log if possible. Our fax number is (866) 854-1103.

**In summation, some very important things to help guide you through the program successfully:**

- **Make sure that all automatic payments have been turned off—delinquency is a necessity.**
- **Do not communicate with creditors/collectors who call, do not agree to payments with creditors who call—this will impede settlement negotiations. If you are inundated with calls notify our office and we will issue cease and desist letters.**
- **Settlement negotiations begin as soon as the banks begin allowing offers (this can range from 90 days to 180 days after payments have stopped on the accounts)**

Should you have any questions or concerns, feel free to email me at [Miranda.King@churchillcreditsolutions.com](mailto:Miranda.King@churchillcreditsolutions.com) or call at (646) 202-2549. Thank you and I wish you all the best.

Sincerely,

Miranda King  
Arbitration Department  
Churchill Credit Solutions  
646-202-2549  
[Miranda.king@churchillcreditsolutions.com](mailto:Miranda.king@churchillcreditsolutions.com)

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10 1



EXHIBIT A

SAMPLE of  
CENSE & DESIST  
LETTER SENT TO  
ALL CREDITORS

Re: Nassar, Susan

ACCTS(S): 4400 6604 1944 8195  
4313 0754 0729 7321

To Whom it May Concern:

The above referenced individual has contracted with our office in connection to his/her debt management case. In that regard, attached please find a Power of Attorney letter authorizing our company, Churchill Credit Solutions, LLC, to discuss and resolve the alleged debt of our client.

Under Public Laws §§ 95-109 and 99-361, better known as the Fair Debt Collection Practices Act, the content and quantity of your communications to our client clearly fall under the purview of harassment and, as such, are unlawful. As of the date of this letter, you must cease all further telephonic communications with our client, his/her family and friends, and his/her workplace in relation to this and all other alleged debts. If you do not comply with this request immediately upon receipt, we will then take all steps necessary on behalf of our client to swiftly adjudicate this case in a court of appropriate jurisdiction, naturally making this case one of public record.

Respectfully,

Arbitration Dept.  
Churchill Credit Solutions, I.L.C  
41 Madison Ave, 31<sup>st</sup> Fl  
New York, NY 10010  
(646) 202-2549

8  
2



EXHIBIT A

EXHIBIT A

LIMITED POWER OF ATTORNEY

DATE of  
LITIGATION  
STARTED REPRESENTING  
SUSAN

I, Susan Nassar, as of 6/30/16 ("Principal"), hereby appoint Churchill Credit Solutions, LLC, of New York, NY 10010, as my lawful attorney to act on my behalf and in my name, place, and stead for the sole and limited purpose of representing me in the negotiation, modification, reduction, and/or elimination of any or all outstanding debt(s) currently owed and enumerated in Exhibit B - Enrolled Debt.

With this Limited Power of Attorney, Churchill Credit Solutions, LLC is given and granted full power and authority to do and perform all and every act and thing necessary to be done in and about the specific and limited premises (set out herein) as fully, to all intents and purposes, as might or could be done if personally present, with full power of substitution and revocation, hereby ratifying and confirming all that said attorney shall lawfully do or cause to be done by virtue hereof.

Client: Susan Nassar  
DOB: 1/9/1981  
SSN: 551-65-4364  
Address: 11090 Seven Pines dr  
Alta Loma CA 91737

Signed:

Susan Nassar  
(Principal)

Date:

07-12-16

Churchill Credit Solutions, LLC  
41 Madison Avenue, 31<sup>st</sup> Floor  
New York, New York 10010

9  
7  
3



richard nassar &lt;massarins@gmail.com&gt;

## Churchill Documents

12 messages

miranda.king@churchillcreditsolutions.com &lt;miranda.king@churchillcreditsolutions.com&gt;

Wed, Jul 27, 2016 at 8:37 AM

Welcome to the program Susan. Please find the attached introduction documents: contact sheet, income form, hardship form, and call log. Please record any calls from creditors that you receive regarding the accounts and forward the log to our office so we know who to send cease and desist letters out to. We'll need income and hardship information down the road when we begin negotiations on the accounts. Please forward any questions/concerns to our office via email/mail.

Best,

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

## 4 attachments

 Call Log.docx  
17K

 Consumer Advocacy Welcome Letter.docx  
36K

 Hardship Request Form.docx  
33K

 Income Questionnaire.pdf  
118K

richard nassar <massarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Mon, Aug 1, 2016 at 10:49 AM

Hello Miranda

Here is a hardship info and Income list as well as some call logs of numbers that we are still getting calls from constantly. Please work on having these calls stopped.

Thank you

Richard Nassar  
Lic.# 0D83052

**PRIME FIDELITY INSURANCE AGENCY**

"TRUSTED FIRST"  
350 S. Milliken Ave, Suite M  
Ontario Ca 91761  
909-245-0822

[Quoted text hidden]

 churchill.pdf  
2183K

richard nassar <massarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Tue, Aug 9, 2016 at 2:17 PM

Here are more call logs just from a week of August. I need to know a status on what you have done so far with our account. Please sen me copies of any documents that have been sent out to the creditors so far. I would like a update on the status thus far.

Thank you

Richard Nassar  
Lic.# 0D83052

**PRIME FIDELITY INSURANCE AGENCY**

"TRUSTED FIRST"  
350 S. Milliken Ave, Suite M  
Ontario Ca 91761  
909-245-0822

On Wed, Jul 27, 2016 at 8:37 AM, &lt;miranda.king@churchillcreditsolutions.com&gt; wrote:

EXHIBIT A

[Quoted text hidden]

 **call log august first week.pdf**  
916K

**miranda.king@churchillcreditsolutions.com** <miranda.king@churchillcreditsolutions.com>  
To: richard nassar <massarins@gmail.com>

Wed, Aug 10, 2016 at 7:38 AM


Hello Richard, attached are copies of the PoA and Cease and Desist letters that were distributed at the beginning of August to each of the banks (the C&D are each personalized with acct numbers). Generally, the banks process within 14 business days (some are much quicker and will have them on file within a week).

Best,

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

[Quoted text hidden]

**2 attachments**

 **Cease and Desist Form Letter.docx**  
53K

 **Nassar, Susan PoA updated.pdf**  
59K

**Insurance** <rnassarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Wed, Aug 10, 2016 at 8:03 AM

Awesome thank you

Sent from my iPhone

[Quoted text hidden]

<Cease and Desist Form Letter.docx>

<Nassar, Susan PoA updated.pdf>

**richard nassar** <massarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Tue, Aug 23, 2016 at 11:24 AM

Hello Miranda,

These calls are getting worst and have not slowed down one bit. I am now receiving calls from different numbers and they are getting more aggressive. I know Neil had asked me not to communicate with these guys, but would it be an issue if i directed them to you or Neil's or even a company phone number for Churchill since your company is representing me at this time. This way the call stop coming into me and you guy can deal with them directly. Here is another list of numbers. Please give me any new updates on my account.


Thank you

Richard Nassar  
Lic.# 0D83052

**PRIME FIDELITY INSURANCE AGENCY**

"TRUSTED FIRST"  
350 S. Milliken Ave, Suite M  
Ontario Ca 91761  
909-245-0822

[Quoted text hidden]

 **log for 2nd half aug.pdf**  
2476K

**miranda.king@churchillcreditsolutions.com** <miranda.king@churchillcreditsolutions.com>  
To: richard nassar <massarins@gmail.com>

Thu, Aug 25, 2016 at 11:30 AM

Richard, please feel free to direct them to our office, you can give them my phone number 646.202.2551. I am looking into seeing if there is some support that Veritas can provide to knock the calls out.

EXHIBIT A

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

Contact us for more information about receiving compensation for referrals!

----- Original Message -----  
Subject: Re: Churchill Documents  
From: richard nassar <massarins@gmail.com>  
[Quoted text hidden]

Insurance <rnassarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Fri, Sep 9, 2016 at 2:04 PM

Can you please ask Niel what is going on with the calls that I am still getting. He was suppose to get back to me in regards to what has been done about the calls still coming in. This issue is still not resolved and I'm getting more calls then before

Sent from my iPhone  
[Quoted text hidden]

miranda.king@churchillcreditsolutions.com <miranda.king@churchillcreditsolutions.com>  
To: Insurance <rnassarins@gmail.com>

Mon, Sep 12, 2016 at 8:21 AM

Hi Richard, I know we issued cease and desist letters, but I'll make sure we check into them today and see why they haven't been processed / why you're still receiving calls.

Best,

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

Contact us for more information about receiving compensation for referrals!

----- Original Message -----  
Subject: Re: Churchill Documents  
[Quoted text hidden]

Insurance <rnassarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Thu, Sep 22, 2016 at 9:02 AM

Good morning Miranda,

I need and update by the end of today please. I need to know exactly what is going on with my account. I was suppose to be in the loop every step of the way and all that I see happening is that my money is being drafted each month and these call are not stopping. I need to know where my money is going and what steps have been takes so far.

Also the only phone number I seem to have for the coming is yours and Niel. The number you gave me to give to creditors is your number and not you legal department. I would like your company's main phone number as well as your legal departments phone number. I would also like the company's info that is drafting my account each month because I noticed it's not Churchill that is taking the money.

Sincerely  
Richard Nassar

Sent from my iPhone  
[Quoted text hidden]

miranda.king@churchillcreditsolutions.com <miranda.king@churchillcreditsolutions.com>  
To: Insurance <rnassarins@gmail.com>

Thu, Sep 22, 2016 at 11:34 AM

Hello Richard,

Firstly, we do not generally reach out to clients unless we run into an issue or a settlement is reached, so if you'd like an update in between you'd just need to reach out to us.

Any calls regarding your account need to be coming to me since I am the arbitrator on your file.  
If you need an alternative number you can call 646 202 2549.

Your money is ONLY going directly into an escrow account with Global (an escrow company). The money is literally sitting in that account until a settlement is reach, at which the funds are deployed to the bank from that account.  
PoAs have been sent on each of your accounts; however it will be at least another couple months before your accounts are charged off (this is when the banks allow us to begin submitting settlement offers, depending on the bank this will range from 90-180 days after your final payment on the account was made).

I've forwarded your message to Victor Castaldo at Veritas, the attorneys, regarding the calls you have been receiving. Since we have already sent PoAs and Cease and desist letters, they will need to step in and take further action. Please let me know if you have any other questions or concerns and I can address it or have Neil reach out to you directly.

Best,

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

Contact us for more information about receiving compensation for referrals!

----- Original Message -----

Subject: Re: Churchill Documents

From: Insurance <massarins@gmail.com>

[Quoted text hidden]

richard nassar <massarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Thu, Sep 22, 2016 at 11:44 AM

Hello Miranda,

I appreciate the update on my account. I hope you understand my frustration with these calls hounding me every day. Especially when i was told they would stop and none of the call have. This alternative number you are giving me, is it your companies main number or the attorney's number? Should i transfer calls to your number or to the alternative number you provided me? Also i have had some account already go to collections, what do i do in that case?

Thanks  
Richard

Richard Nassar  
Lic.# 0D83052

**PRIME FIDELITY INSURANCE AGENCY**

"TRUSTED FIRST"  
350 S. Milliken Ave, Suite M  
Ontario Ca 91761  
Office: 909-276-7160  
Fax: 909-963-5100

[Quoted text hidden]

13  
7



richard nassar <rnassarins@gmail.com>

**[FWD: RE: Susan Nassar]**

4 messages

miranda.king@churchillcreditsolutions.com <miranda.king@churchillcreditsolutions.com>  
To: richard nassar <rnassarins@gmail.com>

Thu, Sep 22, 2016 at 12:21 PM

Richard, have you received calls on only the home number or cell/work numbers as well?

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

Contact us for more information about receiving compensation for referrals!

----- Original Message -----

Subject: RE: Susan Nassar  
From: Victor Castaldo <victor@veritaslegalplan.com>  
Date: Thu, September 22, 2016 3:00 pm  
To: "miranda.king@churchillcreditsolutions.com"  
<miranda.king@churchillcreditsolutions.com>

Hi Miranda,  
Were they called on the home number?

Victor Castaldo  
Ph# 877-745-5006 ext 1004  
Fax# 888-774-4271  
Email: Victor@Veritaslegalplan.com



**Veritas Legal Plan**

From: miranda.king@churchillcreditsolutions.com [mailto:miranda.king@churchillcreditsolutions.com]  
Sent: Thursday, September 22, 2016 2:34 PM  
To: Victor Castaldo <victor@veritaslegalplan.com>  
Subject: Susan Nassar

Hi Victor. Our clients Susan and Richard Nassar have been being inundated with very aggressive collection calls from [mainly] Discover, Richard while he is at work. I've attached their call logs. We have sent PoAs and Cease and Desist letters, but the calls just keep continuing. They've asked them to stop calling repeatedly. Is there anything you guys could do to intervene?

Contact: Richard Nassar, 909-245-0822, rnassarins@gmail.com [ email is usually the easiest way to contact].

Thank you

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

Contact us for more information about receiving compensation for referrals!

14 8

EXHIBIT A

richard nassar <massarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Thu, Sep 22, 2016 at 12:26 PM

most of the calls are coming to my cell and mostly my wife's cell daily multiple times a day and sometimes back to back from the same company. for instants Discover is now calling from this number 480-481-1846 and some are blocking their numbers now

Richard Nassar  
Lic.# 0D83052

**PRIME FIDELITY INSURANCE AGENCY**

"TRUSTED FIRST"  
350 S. Milliken Ave, Suite M  
Ontario Ca 91761  
Office: 909-276-7160  
Fax: 909-963-5100

[Quoted text hidden]

miranda.king@churchillcreditsolutions.com <miranda.king@churchillcreditsolutions.com>  
To: richard nassar <massarins@gmail.com>

Thu, Sep 22, 2016 at 12:49 PM

Richard please see the message below. Please contact veritas at 877 745 5006 ext 1014 to go over details of the calls you are receiving.

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

Contact us for more information about receiving compensation for referrals!

----- Original Message -----

Subject: RE: Susan Nassar  
From: Victor Castaldo <victor@veritaslegalplan.com>  
Date: Thu, September 22, 2016 3:37 pm  
To: "miranda.king@churchillcreditsolutions.com"  
<miranda.king@churchillcreditsolutions.com>

No Problem.. Tell her to call Veritas again and enter ext 1014 that is Brittney. She will be able to help them. if she is not there tell Susan to leave a message and she will get back to her.

Victor Castaldo  
Ph# 877-745-5006 ext 1004  
Fax# 888-774-4271  
Email: [Victor@Veritaslegalplan.com](mailto:Victor@Veritaslegalplan.com)



From: miranda.king@churchillcreditsolutions.com [mailto:miranda.king@churchillcreditsolutions.com]  
Sent: Thursday, September 22, 2016 3:30 PM  
To: Victor Castaldo <victor@veritaslegalplan.com>  
Subject: RE: Susan Nassar

Thanks for getting back to me Victor. They are calling their cell phones.  
[Quoted text hidden]

richard nassar <massarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Thu, Sep 22, 2016 at 12:59 PM

Awesome Thank you

15 9

Richard Nassar  
Lic.# 0D83052

EXHIBIT A

**PRIME FIDELITY INSURANCE AGENCY**

"TRUSTED FIRST"  
350 S. Milliken Ave, Suite M  
Ontario Ca 91761  
Office: 909-276-7160  
Fax: 909-963-5100

[Quoted text hidden]

16  
10



## Churchill Credit Solutions Consumer Advocacy Call Log

[illegible]

EXHIBIT A

Churchill Credit Solutions Consumer Advocacy  
Call Log

Date	Time	Creditor	Phone Number
08/02/16	3:20 pm	B of A	800-451-6362
08/02/16	8:44 am	Discover	623-643-2727
08/02/16	10:53 am	B of A	800-451-6362
08/03/16	11:25 am	Citi	423-477-2488
08/03/16	9:32 am	B of A	800-451-6362
08/03/16	8:00 am	Discover	<del>623</del> -643-2727
08/02/16	12:00 pm	CHASE	407-732-2414
08/03/16	12:32 pm	Discover	623-643-2727
08/02/16	12:00 pm	B of A	800-451-6362
08/01/16	10:32 am	CHASE	847-426-9203
08/04/16	11:00 am	B of A	800-451-6362
08/04/16	10:35 am	Discover	623-643-2727
08/03/16	8:16 am	Citi	800-388-2200
08/03/16	5:28 pm	Citi	423-477-2488
08/05/16	11:31 am	Citi	423-477-2488
08/05/16	8:00 am	Discover	623-643-2727
08/05/16	8:00 am	Citi	800-388-2200
08/05/16	12:30 pm	Citi	800-388-2200
08/05/16	2:43 pm	B of A	800-451-6362
08/05/16	2:53 pm	Citi	423-477-2488
08/05/16	2:50 pm	CHASE	847-426-9203
08/09/16	12:35 pm	Discover	623-643-2727
08/09/16	8:18 am	B of A	800-451-6362

(16)

(12)

EXHIBIT A

Churchill Credit Solutions Consumer Advocacy  
Call Log

Date	Time	Creditor	Phone Number
08/09/16	12:35pm	Discover	623-643-2727
08/09/16	6:10pm	BofA	800-451-6362
08/10/16	12:37pm	Discover	623-643-2727
08/11/16	8:54am	BofA	800-451-6362
08/11/16	12:54pm	Discover	623-643-2727
08/12/16	8:32am	BofA	800-451-6362
08/12/16	12:27pm	Discover	623-643-2727
08/13/16	8:31am	BofA	800-451-6362
08/13/16	8:46am	Discover	623-643-2727
08/15/16	8:52am	Discover	623-643-2727
08/15/16	12:39pm	BofA	800-451-6362
08/16/16	9:15am	BofA	800-451-6362
08/16/16	12:25pm	Discover	623-643-2727
08/16/16	6:45pm	BofA	800-451-6362
08/17/16	8:10am	BofA	800-451-6362
08/18/16	9:51am	Discover	623-643-2727
08/19/16	8:48am	BofA	800-451-6362
08/19/16	9:28am	Discover	623-643-2727
08/22/16	8:23pm	BofA	800-451-6362
08/22/16	8:48am	BofA	800-451-6362
08/22/16	10:39am	BofA	800-451-6362
08/21/16	10:41am	Discover	623-643-2727
08/20/16	9:49am	Discover	623-643-2727

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EXHIBIT A

Churchill Credit Solutions Consumer Advocacy  
Call Log

Date	Time	Creditor	Phone Number
08/17/16	10:41am	CITI	877-437-1985
08/17/16	2:13pm	CITI	877-437-1985
08/18/16	9:42am	Discover	623-643-2727
08/17/16	12:03pm	CITI	877-437-1985
08/17/16	2:43pm	CITI	877-437-1985
08/17/16	1:17pm	BoFA	800-451-6362
08/17/16	3:37pm	CITI	877-437-1985
08/17/16	3:48pm	BoFA	800-451-6362
08/18/16	9:18am	Discover	623-643-2727
08/18/16	10:31am	CITI	877-437-1985
08/18/16	11:19am	BoFA	800-451-6362
08/18/16	2:03pm	CITI	877-437-1985
08/18/16	3:34pm	CHASE	847-426-9203
08/18/16	4:17pm	CITI	877-437-1985
08/18/16	5:37pm	BoFA	800-451-6362
08/18/16	5:42pm	CITI	877-437-1985
08/18/16	6:48pm	Discover	623-643-2727
08/19/16	8:18am	Discover	623-643-2727
08/19/16	9:46am	CHASE	847-426-9203
08/19/16	10:20am	BoFA	800-451-6362
08/19/16	3:24pm	CHASE	847-426-9203
08/19/16	4:40pm	BoFA	800-451-6362
08/19/16	5:47pm	BoFA	800-451-6362
08/20/16	8:37am	CITI	877-437-1985

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EXHIBIT A

Churchill Credit Solutions Consumer Advocacy  
Call Log

Date	Time	Creditor	Phone Number
08/20/16	8:28 AM	DISCOVER	623-643-2727
08/20/16	9:13 AM	CITI	800-388-2200
08/21/16	10:16 AM	CITI	800-388-2200
08/21/16	11:23 AM	CITI	877-437-1985
08/21/16	11:38 AM	CITI	800-388-2200
08/22/16	8:16 AM	DISCOVER	623-643-2727
08/22/16	8:19 AM	CITI	423-477-2488
08/22/16	8:30 AM	CITI	800-388-2200
08/23/16	9:05 AM	BoFA	800-451-6362
08/22/16	8:06 AM	CITI	423-477-2488
08/22/16	9:11 AM	BoFA	800-451-6362
08/22/16	9:15 AM	CITI	800-388-2200
08/22/16	9:38 AM	DISCOVER	623-643-2727
08/22/16	10:42 AM	DISCOVER	623-643-2727
08/22/16	11:10 AM	CITI	423-477-2488
08/23/16	8:05 AM	BoFA	800-451-6362
08/23/16	8:11 AM	DISCOVER	623-643-2727
08/23/16	8:29 AM	DISCOVER	623-643-2727
08/23/16	10:05 AM	BoFA	800-451-6362

(21)  
(15)